



BRIAN C. WHITAKER, ESQ.  
Nevada Bar No. 2329  
Email: bwhitaker@ericksonwhitaker.com  
**ERICKSON & WHITAKER PC**  
1349 Galleria Drive, Suite 200  
Henderson, NV 89014  
Telephone: 702-433-9696  
Facsimile: 702-434-0615  
***Attorneys for Plaintiff***  
***Paul B. Canale, M.D.***

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

PAUL B. CANALE, M.D., an individual and  
Alabama resident,

Plaintiff,

vs.

SAHARA OUTPATIENT SURGERY  
CENTER, LTD, a Nevada limited partnership;  
SURGICARE OF LAS VEGAS, INC., a Nevada  
corporation; LANCE HICKMAN, an individual  
and Tennessee resident; DOES I through X;  
ROE CORPORATIONS I through X, inclusive,

Defendants.

**CASE: 2:18-CV-01020-GMN-VCF**

**STIPULATION AND ORDER TO**  
**EXTEND DEADLINE FOR PAUL B.**  
**CANALE, M.D. TO RESPOND TO**  
**MOTION TO DISMISS**

(First Request)

Plaintiff, PAUL B. CANALE, M.D., and Defendants, SAHARA OUTPATIENT SURGERY  
CENTER, LTD. and SURGICARE OF LAS VEGAS, INC. (hereinafter "Surgery Center Parties"), by  
and through their counsel of record, stipulate and agree as follows:

1. On June 19, 2018, Surgery Center Parties filed and served their Motion to Dismiss;
2. The parties stipulate and agree that the date for Plaintiff to oppose Surgery Center Parties' Motion shall be continued from July 3, 2018 to July 10, 2018.
3. Additional time is needed for counsel to confer and review exhibits with Plaintiff to respond to Surgery Center Parties' Motion.
4. This is the first stipulation for an extension of time for Plaintiff to respond to Surgery Center Parties' Motion. The stipulation is made in good faith and not to delay the proceedings.



1 IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

2 DATED this 29<sup>th</sup> day of June, 2018

3 ERICKSON & WHITAKER PC

DATED this 29<sup>th</sup> day of June, 2018

BAILEY KENNEDY

5 By: /s/ Brian C. Whitaker

6 BRIAN C. WHITAKER

Nevada Bar No. 2329

Email: bwhitaker@ericksonwhitaker.com

1349 Galleria Drive, Suite 200

Henderson, NV 89014

8 *Attorneys for Plaintiff Paul B. Canale, M.D.*

By: /s/ Andrea M. Champion

JOSHUA M. DICKEY

Nevada Bar No. 6621

ANDREA M. CHAMPION

Nevada Bar No. 13461


8984 Spanish Ridge Avenue

Las Vegas, NV 89148

*Attorneys for Defendants Sahara Outpatient  
Surgery Center, Ltd. and Surgicare of Las Vegas,  
Inc.*

12 IT IS SO ORDERED.

14 DATED this 30 day of June, 2018.

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17 Gloria M. Navarro, Chief Judge  
18 United States District Court